

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:)
)
) Chapter 9
CITY OF DETROIT,)
) Case No. 13-53846
)
Debtor.) Hon. Steven W. Rhodes
)
)
_____)

**CONCURRENCE IN UNITED STATES OF AMERICA'S
OBJECTION TO MOTION OF THE CITY OF DETROIT FOR
ENTRY OF AN ORDER PURSUANT TO 11 U.S.C. § 105(a)
AND FED. R. BANKR. P. 3007 APPROVING
CLAIM OBJECTION PROCEDURES**

The Equal Employment Opportunity Commission ("Commission") by its attorney, Dale Price, Trial Attorney, files this concurrence in the *United States of America's Objection to Motion of the City of Detroit for Entry of an Order Pursuant to 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 3007 Approving Claim Objection Procedures* and states:

1. The undersigned United States Equal Employment Opportunity Commission ("Commission" or "EEOC") is the claimant herein. The EEOC's address is 477 Michigan Avenue, Room 865,

Detroit, Michigan 48226. The Commission is the agency of the United States Government charged with the interpretation and enforcement of, as relevant here, Title VII of the Civil Rights Act of 1964 (Title VII), as amended, 42 U.S.C. ' 2000e, et seq.; Title I of the Civil Rights Act of 1991 (Title I), 42 U.S.C. 1981a, et seq.; and Title I of the Americans with Disabilities Act of 1990 (ADA), as amended, 42 U.S.C. 12101, et seq.

2. The Commission's undersigned Trial Attorney filed a Consolidated Proof of Claim and Memorandum in Support of EEOC's Consolidated Proof of Claim on behalf of the EEOC on March 19, 2014, and an Amended Consolidated Proof of Claim and Memorandum in Support on June 3, 2014.

3. The Commission's Amended Consolidated Proof of Claim covers ten (10) Charges of employment discrimination, or sub-claims, for which monetary relief is sought.

4. If, upon completion of EEOC's investigation into each Charge, EEOC determines that there is reasonable cause to believe the charges are true, Debtor will become liable for backpay, compensatory damages, punitive damages and interest to remedy unlawful discrimination as set

forth in the Consolidated/Amended Consolidated Proof of Claim.

5. On June 10, 2014, the Debtor filed a Motion for entry of an order setting certain claim objection procedures under 11 U.S.C. § 105(a) and FED. R. BANKR. P. 3007 (Docket No. 5270).

5. On June 24, 2014, the United States filed an Objection to the Debtor's motion (Docket No. 5560).

Concurrence

The Equal Employment Opportunity Commission concurs with the *United States of America's Objection to Motion of the City of Detroit for Entry of an Order Pursuant to 11 U.S.C. § 105(a) AND FED. R. BANKR. P. 3007 Approving Claim Objection Procedures* for the reasons stated therein.

Relief Requested

The Commission respectfully requests that the Debtor's Motion be denied to the extent sought by the United States of America, and that this Court grant the Commission any such additional relief as is just and proper.

Respectfully submitted,

/s/ Dale Price

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Dated: June 24, 2014

CERTIFICATE OF SERVICE

I hereby certify that on June 24, 2014, I electronically filed the foregoing document(s) with the Clerk of the Court using the ECF System, which will provide electronic notice and copies of such filing of the following to the parties:

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